

handled. Second, AT&T's relatively small volume of orders may limit the ability of its personnel to gain the needed experience to learn either AT&T's or BellSouth's processes well enough to handle orders in an error-free manner. Third, as the results of the other CLEC cited above indicate, BellSouth's processes can work well when utilized by a CLEC who is active in the market with a significant volume, processes orders daily, and devotes time and attention to process improvement and conformance.

11. Despite AT&T's assertion throughout its comments that it is interested in the "broad-scale mass-market", the hot-cut process assailed by AT&T is really focused on handling the medium to large size business market that typically involves designed loops. Designed loops, as the name implies, involves more complex services than non-designed loops that are more easily handled by routine procedures. Furthermore, given the complexity of transitioning designed loops that serve banks, advertising agencies, automobile dealerships, and governmental entities, it is not surprising that AT&T is able to cite anecdotal cases of unsuccessful cutovers. However, it is not valid to assume that cutovers of true mass-market customers, that is, for example, the residential market, would encounter the same level of difficulty.
12. I take issue with AT&T's assertion that there will be large fluctuations in demand in an environment of widespread geographic competition. The underlying view espoused by Mr. Pfau in his affidavit at paragraphs 69-70 is not supported by any evidence and is contrary to the nature of service order processing as I have experienced it. Customers are won or lost one at a time. Further, effective organizations must hire and train its sales and

support personnel one at a time. As they come on line, volume can increase. So any change in demand will typically occur on a gradual basis. BellSouth is very accustomed to increasing its own staffing as demand increases. Of course, there have been and will continue to be seasonal demand peaks with which BellSouth and other service providers, including AT&T, have contended for years. This is certainly not a new phenomenon of local service competition.

13. Likewise, Mr. Pfau is erroneous in his assumption that BellSouth can not respond to CLEC cutover orders in small or rural offices. Local service requests (LSRs) requiring cutover activity are not a surprise to BellSouth managers. Present procedures require BellSouth to provide CLECS with firm order confirmations (FOCs) showing the due date. Also, end-users with complex services, that is, those most likely to require a coordinated cutover, typically place their orders with CLECs well in advance of their desired due date for reasons of their own preparedness. Given this routine advance information, BellSouth can and has readily dispatched its work forces to those locations where cutover orders are scheduled.
14. On page 95, AT&T asserts that incumbent LEC technicians take steps to electronically reassign or "port" the customer's telephone number from the incumbent LEC's switch to the CLEC's switch. While BellSouth's technicians pass information to NPAC (Number Portability Administration Center) to set up the port, it is the CLEC that has responsibility for sending the final message that completes the cutover. Thus, it is the CLEC's responsibility to assure that everything is in place before sending this final message.

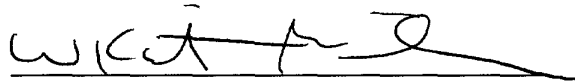
15. AT&T makes an incorrect assumption on page 104 of its comments when it states that ILECs do not typically physically remove facilities when a customer moves from one location to another. End-users often move from one central office service area to another central office serving area. This requires the disconnection of service for the old location, the connection of service to the new location, and the coordination of the activities for both locations in a process comparable to a hot cut. To make the most efficient use of its facilities, BellSouth balances the cost of extra facilities against the expenses of physical disconnection and reconnection. Here again, this practice is certainly not new to the environment of local competition.
16. On pages 97-98 of its comments, AT&T complains about a lack of market information and the difficulty of determining locations for its switches. CLECs interested in entering the communications business must determine their own strategies and market areas. Other CLECs seem to be moving ahead with switch installations with great confidence. As of the end of May 1999, 161 CLEC switches were in operation in the BellSouth Region with another 122 forecasted by the CLECs to be in operation by the end of 1999.
17. AT&T suggests on pages 98-99 of its comments that prior decisions by the Commission regarding shared transport are somehow applicable to issues related to the unbundling of local switching. Regrettably, aside from repeating quotes from the shared transport decisions, AT&T offers no evidence to support its position. The shared transport decisions merely reduced the CLECs need for dedicated transport in some cases.

18. AT&T's footnote at the bottom of page 104 clearly reveals AT&T's strategy of posturing the cutover process as being unmanageable. AT&T is correct that an ILEC would be fully aware of its own upcoming major cutovers. AT&T then states that the ILEC would not know of a CLEC's upcoming major cutovers until a few days in advance. In the situation described in the footnote, the ILEC will know of upcoming CLEC cutovers if the CLEC informs the ILEC of its plans in a timely fashion so that cutover teams or project managers from both companies can plan for the demands such a cutover places on the entire interdependent process. If the CLEC does not approach any cutover with a proactive, positive attitude and process, that CLEC will encounter difficulties regardless of the completeness of any set of methods and procedures developed by ILECs or CLECs.
19. Another example of AT&T's over-dramatization of perceived problems with the hot-cut process is its assumption on page 105 of its comments that all media reports of cutovers encountering problems will be attributed to the CLECs. The reality of modern media reporting is that both ILECs and CLECs might be criticized when end-users encounter out-of-service conditions, regardless of who might be at fault in a particular instance.
20. At paragraph 53 of Mr. Pfau's affidavit and in AT&T's comments on page 106, reference is made to alleged service outage complaints in Florida which AT&T claims were "apparently" caused by BellSouth's hot cut procedures. Since AT&T provided no further details, BellSouth is unable to provide a definitive response. BellSouth's AT&T Account Team was informed that there had been service complaints, but no specific details were offered. No request for a root cause analysis was made as it

typically done in such cases. When an outage is attributable to a gap in procedures, BellSouth's quality reviews ensure a prompt fix to avoid similar occurrences in the future.

21. This concludes my affidavit.

I hereby swear that the foregoing is true and correct to the best of my information and belief.

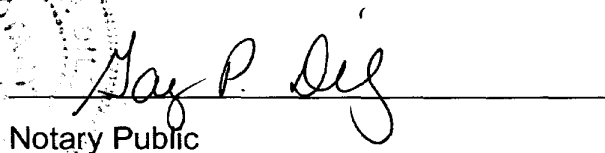
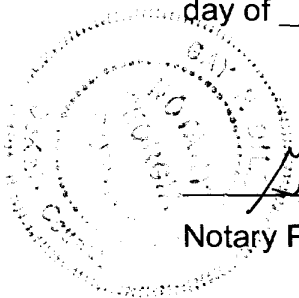


W. Keith Milner

Senior Director-Interconnection Services

BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 9th
day of June, 1999.



Notary Public

GAY P. DILZ
NOTARY PUBLIC DEKALB COUNTY GEORGIA
MY COMMISSION EXPIRES FEBRUARY 10, 2003